

December 1, 2022

The Honorable Judge John G. Koeltl United States District Court Southern District of New York 500 Pearl Street

New York, NY 10007

VIA ECF

Re:

report of the Court on the states of the matter by 2/20/243, So ordered. W Girl Order Ltd. et al. 389 New Girl Order LLC v. New Girl Order Ltd. et al.

Civil Case No.: 1:21-cv-05889

Dear Judge Koeltl:

This firm represents the Plaintiff, New Girl Order LLC in the above-mentioned action. We write jointly with Defendants to request a stay of the deadlines set in the Civil Scheduling Order (Dk. 85) pending the outcome of a Settlement Conference with Magistrate Judge Netburn scheduled for February 13, 2023.

The Civil Scheduling Order provides for the completion of all discovery is January 16, 2023, dispositive motions are to be completed by February 17, 2023, and the pre-trial order along with any motions in limine are required to be submitted by March 10, 2023. Given Magistrate Judge Netburn's busy calendar, the Settlement Conference was scheduled for one of the earliest available dates. There have been no previous extensions of the Civil Scheduling Order deadlines.

The parties further request to schedule a conference with Your Honor on the earliest available date after the Settlement Conference is held on February 13, 2023, in the event that a settlement is not reached, to revise the Civil Scheduling Order to ensure the expedient litigation of this matter.

Therefore, we respectfully request a stay of the deadlines set forth in the Civil Scheduling Order and the scheduling of a conference with Your Honor, on a date convenient to the Court after February 13, 2023.

Thank you for your courtesies and attention to this matter.

Very truly yours,

Falcon Rappaport & Berkman PLLC

By: Jessica M. Moore, Esq.